

April 7, 2011

VIA EMAIL

Roger Kiers  
Washington State Department of Transportation  
Transportation Building  
310 Maple Park Ave. SE  
Olympia, Washington 98504-7300  
kiersro@wsdot.wa.gov

Chris Jenkins  
Army Corps of Engineers, Seattle District  
P.O. Box 3755-  
Seattle, Washington 98124-3755  
Paul.c.jenkins@usace.army.mil

**NATIONAL  
TRUST  
FOR  
HISTORIC  
PRESERVATION®**

**Western  
OFFICE**

**Re: SR 162 Puyallup River Bridge (McMillin Bridge) Project  
Request for Consulting Party Status**

Dear Mr. Kiers & Mr. Jenkins,

The National Trust is concerned about the proposal to replace the Puyallup River Bridge (McMillin Bridge) in Pierce County, Washington and we would like to participate in the review process as a consulting party under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. § 470f, pursuant to 36 C.F.R. §§ 800.2(c)(5) and 800.3(f)(3). In addition, we believe that compliance with the National Environmental Policy Act (NEPA) will also be required for this project, and we would like to receive and comment on any documents prepared pursuant to NEPA.

The 1934 Puyallup River Bridge, or McMillin Bridge, was listed in the National Register of Historic Places in 1982 and has statewide and national significance because of its unique design and innovative use of materials. Designed by famed structural engineer Homer M. Hadley, it was built using a concrete half-through truss design. This bridge is a rare—if not the only—surviving example of a reinforced concrete through truss bridge remaining in the United States. At the time of its construction it was thought to be the longest concrete truss or beam span in the country.

The National Trust for Historic Preservation has been in contact with other parties participating in the consultation for this project, and we have serious concerns about several elements of the review process to date. Before taking the drastic and

**Western Office**

5 Third Street, Suite 707  
San Francisco, CA 94103

P 415.947.0692

F 415.947.0699

E wro@nthp.org

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**National Office**

1785 Massachusetts Avenue, NW  
Washington, DC 20036

P 202.588.6000

F 202.588.6038

E info@nthp.org

[www.PreservationNation.org](http://www.PreservationNation.org)

irreversible step of demolishing the McMillin Bridge, the Army Corps of Engineers and WSDOT are obliged to thoroughly evaluate alternatives and modifications to the project that would avoid, minimize, or mitigate adverse effects, and to provide a meaningful opportunity for consultation. We are particularly concerned that there has not been an adequate consideration of alternative plans to rehabilitate the bridge, rather than replace and demolish it, in light of the bridge's high level of significance. In a September 3, 2010 memorandum, for instance, WSDOT apparently rejected a preservation alternative because of concerns with "graffiti, kids jumping from or climbing on the bridge, and use by fishermen..." (Bridge Preservation Alternatives Technical Memorandum) These are not adequate justifications for demolishing such a unique part of Washington's heritage.

The National Trust has a long history of involvement in transportation issues, both at the policy level and with respect to individual projects. We think the Trust could play a constructive role in the Section 106 consultation process for this project, by bringing our national perspective as well as our experience with historic bridge preservation issues to the table. Although it will be difficult for us to attend many meetings in person, due to limited travel budgets and time constraints, we hope that you will be able to provide a means for us to join the consultation process through telephone conference calls or web links. We have participated in many Section 106 consultations for projects around the country using telephonic and web communication, and we find that it provides a pragmatic and cost-effective approach to consultation.

### **Interests of the National Trust**

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit organization for the purpose of furthering the historic preservation policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of almost 200,000 members nationwide; including 3,000 in Washington state, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government.

The Trust has a particular interest in enforcing federal agency compliance with the National Historic Preservation Act, since the Chairman of the Trust has been designated by Congress as a member of the federal Advisory Council on Historic Preservation. Id. § 470i(a)(8). In addition, the Trust has a long history of involvement in Section 106 consultation regarding individual historic bridge projects.

Roger Kiers, WDOT  
Chris Jenkins, USACE  
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Please include the following representatives of the National Trust on your list of consulting parties, as well as for the distribution of any public notices and documents available for comment:

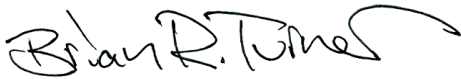
Elizabeth Merritt  
Deputy General Counsel  
National Trust for Historic Preservation  
1785 Massachusetts Ave. NW  
Washington, DC 20036  
betsy\_merritt@nthp.org

Brian Turner  
Regional Attorney, Western Office  
National Trust for Historic Preservation  
5 Third St., Suite 707  
San Francisco, CA 94118  
brian\_turner@nthp.org

Sincerely,



Elizabeth S. Merritt  
Deputy General Counsel



Brian R. Turner  
Regional Attorney, Western Office

cc:

John Eddins, ACHP  
Charlene Vaughn, ACHP  
Reid Nelson, ACHP  
Allyson Brooks, Ph.D., SHPO  
Chris Moore, Washington Trust for Historic Preservation  
Kitty Henderson, Historic Bridge Foundation